

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FRANTZ SAMSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

UNITED HEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER TO EXTEND  
DEADLINE FOR DEFENDANT TO  
FILE REPLY IN SUPPORT OF  
PENDING MOTION TO DECERTIFY  
THE CLASSES AND TO RENOTE  
THE MOTION TO DECERTIFY THE  
CLASSES**

**NOTE ON MOTION CALENDAR:  
September 20, 2024**

Under Local Civil Rules 7(d)(1) and 10(g), Plaintiff Frantz Samson (“Samson”) and Defendant United HealthCare Services, Inc. (“United”) stipulate as follows:

WHEREAS United filed its Motion to Decertify the Classes (Dkt. #311) on July 22, 2024;

WHEREAS, United did not oppose Plaintiff’s request to re-note this motion to allow for Plaintiff’s Response Brief to be filed on September 13, 2024 (Dkt. #330);

WHEREAS Plaintiff submitted with his Response Brief a new class list, new evidence (Dkt. #331) and a new expert witness declaration (Dkt. #332), which United seeks discovery regarding before filing a Reply Brief in Support of its Motion to Decertify the Class;

WHEREAS, United’s Reply Brief currently is due to be filed on or before October 4, 2024;

WHEREAS, Plaintiff has represented that his expert witness is unavailable for deposition before October 15, 2024;

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WHEREAS the parties jointly agree that the deadline for United's Reply may be extended to be filed on November 1, 2024, to allow for the completion of necessary discovery and depositions.

Therefore, the Parties request that the Court grant this Stipulated Motion, permitting United to file its Reply in Support of its Motion to Decertify the Classes by November 1, 2024 and re-noting the Motion to Decertify the Classes for November 1, 2024.

DATED: September 20, 2024

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STIPULATED MOTION AND ~~PROPOSED~~ ORDER  
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### ORDER

Based on the foregoing Stipulation, IT IS SO ORDERED. United may file its Reply in Support of its Motion to Decertify the Classes by November 1, 2024, and may re-note the Motion to Decertify the Classes for November 1, 2024. The Parties are expected to complete discovery by November 1, 2024, as per the previous deadlines set in this case. (See Dkt. No. 304.)

DATED this 23rd day of September 2024.



The Honorable Marsha J. Pechman  
United States District Court Judge